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7 Attorney for Ronald Harris

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12
13 v.
14 RONALD HARRIS,
15 Defendant.

Case No. 2:09-cr-223-GMN-LRL

STIPULATION TO CONTINUE
REVOCATION HEARING
(Fourth Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
18 United States Attorney, and Robert Knief, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and
20 Monique Kirtley, Assistant Federal Public Defender, counsel for Ronald Harris, that the
21 Revocation Hearing currently scheduled on January 12, 2017, be vacated and continued to a
22 date and time convenient to the Court, but no earlier than forty-five (45) days.

23 This Stipulation is entered into for the following reasons:

- 24 1. The defendant is in custody and does not oppose the continuance.
25 2. On January 19, 2016, Mr. Harris was indicted for possession with intent to
26 distribute, in case number 2:16-cr-014-GMN-CWH.

1 3. On May 25, 2016, a motion to suppress was filed in case number 2:16-cr-014-
2 GMN-CWH. An evidentiary, on the motion to suppress, was conducted on May 25, 2016. On
3 June 30, 2016, the Magistrate Judge entered a Report and Recommendation. (CR#17). The
4 parties filed timely Objections and Responses to the Report and Recommendation. (CR# 27,
5 29) On November 14, 2016, this Court adopted in Full the Report and Recommendation. (CR#
6 36).

7 4. The revocation hearing on case 2:09-cr-223-GMN-LRL is currently scheduled
8 for January 12, 2017. The revocation petition is inextricably linked to case 2:16-cr-014-GMN-
9 CWH, which is currently scheduled for trial on February 27, 2017. The criminal indictment and
10 the revocation petition allege the same criminal conduct. The parties are negotiating a global
11 resolution for both cases.

12 5. The additional time requested herein is not sought for purposes of delay, but
13 merely to allow for the complete resolution of the plea negotiations, prior to the hearing on the
14 revocation petition.

15 This is the fourth request for a continuance of the revocation hearing.

16 DATED this 10th day of January, 2017.

17
18 RENE L. VALLADARES
19 Federal Public Defender

 DANIEL G. BOGDEN
 United States Attorney

20 /s/ Monique Kirtley
21 By _____
22 MONIQUE KIRTLEY
 Assistant Federal Public Defender

 /s/ Robert Knief
 By _____
 ROBERT KNIEF
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 RONALD HARRIS,

7 Defendant.

Case No. 2:09-cr-223-GMN-LRL

ORDER

9
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for
11 Thursday, January 12, 2017 at 11:00 a.m., be vacated and continued to March 3, 2017
12 at the hour of 9:00 a.m.; or to a time and date convenient to the court in Courtroom 7C.

13 DATED this 11 day of January 2017.

14
15 
16 UNITED STATES DISTRICT JUDGE